IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT
LASALLE COUNTY, OTTAWA, ILLINOIS

FILED
JUL 20 2015
LA SALLE COUNTY CIRCUIT CLERK
THIRTEENTH JUDICIAL CIRCUIT OF ILLINOIS

KEVIN R. KRAMER Petitioner, vs. JULIA C. EICKMEIER, Respondent.	)	No. 15-F-153 IV-D: C02786053

PETITION FOR RULE TO SHOW CAUSE

NOW COMES the Petitioner, KEVIN R. KRAMER, by his attorneys, Aplington, Kaufman, McClintock, Steele & Barry, Ltd., Robert B. Steele of counsel, and for his Petition for Rule to Show Cause states as follows:

1. That a Joint Parenting Order was entered on April 24, 2014 in Bureau County, Illinois which provided in part as follows:

   a. The parties are named as joint custodian of the minor child and that joint custody of the minor child of the parties, namely Madeline, is awarded to the parties, Petitioner, Kevin Roy Kramer, and the Respondent, Julia C. Eickmeier. Each parent shall be designated the "Custodial Parent" while the child is in their respective physical possession, and likewise, the other respective parent shall be designated as the "Non-Custodial Parent" while not having physical possession of the minor child.

   b. The minor child shall be in custody of Petitioner, Father, as follows:

      (i) On alternating weekends from Friday at 6 pm. until Sunday at 6 pm.

      (ii) Every Thursday from 10 am until Friday at 6 pm.

(iii) Legal holidays:

ODD NUMBERED YEARS	EVEN NUMBERED YEARS
Christmas Eve	New Years Day
Lincoln's Birthday	Good Friday/Easter
Memorial Day	Labor Day
Independence Day	Veteran's Day
Thanksgiving Day	Christmas Day

When the holiday shall fall on a Friday, and is to be celebrated on that day, then the holiday physical possession shall commence on Friday at 8 A.M. and end on Sunday at 6 P.M. When the holiday shall be celebrated on Monday or falls on a Monday, then the holiday physical possession commences on Friday at 5 P.M. and ends Monday at 6 P.M. The parent entitled to the physical possession shall have the physical possession irrespective of the alternating weekend provision and the other parent shall have the following weekend and thus beginning a new sequence of alternating weekends. The parent that does not have physical possession of the child on any given holiday shall be allowed reasonable phone contact with the child on that holiday.

(v) Father's Day

(vi) Father's birthday

(vii) For such other times as the parties can agree upon. Father agrees to cooperate with Mother in providing daycare or babysitting assistance through his use of custodial time, when practical.

2. That despite demand for visitation, Respondent has continued to withhold visitation from the Petitioner upon numerous occasions including Christmas, Father's Day, alternating weekends and other times he is entitled to the child.
3. That Respondent has prevented Petitioner from having reasonable visitation with the minor child since December, 2014.
4. When Petitioner goes to Respondent's home for the minor child, she either refuses to answer the door or is not present.
5. Her actions are a deliberate attempt to deprive Petitioner visitation rights

WHEREFORE, the Petitioner, KEVIN R. KRAMER, prays:

A. For the entry of a Rule to Show Cause requiring, the Respondent, JULIA C. EICKMEIER, to appear and show cause, if any has, why she should not be held in willful contempt of this Court;

B. For an award of attorneys' fees necessitated by the willful conduct of the Respondent in violation of the Joint Parenting Agreement; and

C. For such other relief as this Court deems just.

KEVIN R. KRAMER, Petitioner,

BY: _____
ROBERT B. STEELE
One of His Attorneys

Robert B. Steele #2712407
Aplington, Kaufman, McClintock
Steele & Barry, Ltd.
160 Marquette St.
P O Box 517
LaSalle, IL 61301
815-224-3200 phone
815-224-3205 fax

CERTIFICATION

Under penalties as provided by law, pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief, and as to such matters and undersigned certifies as aforesaid that he verily believes the same to be true.

Kevin R. Kramer

KEVIN R. KRAMER

Robert B. Steele
ARDC No. 2712407
APLINGTON, KAUFMAN,
MCCLINTOCK, STEELE & BARRY, LTD.
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LaSalle, Illinois 61301
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ILLINOIS DEPARTMENT OF HEALTHCARE AND FAMILY SERVICES, EX REL, JULIA EICKMEIER	)	
Petitioner,	)	
vs.	)	No. 15-F-153
KEVIN KRAMER,	)	IV-D: C02786053
Respondent.	)	

ORDER FOR RULE TO SHOW CAUSE

NOW on this day, this cause coming on to be heard upon verified Petition of the Respondent, KEVIN KRAMER, represented by the law firm of Aplington, Kaufman, McClintock, Steele & Barry, Ltd. whose address is 160 Marquette St., LaSalle, Il 61301, for a Rule To Show Cause why the Petitioner, JULIA EICKMEIER, should not be adjudge guilty of and punished for contempt of court.

1. It appearing to the Court that the Petitioner has failed and neglected to comply with the provisions of the Joint Parenting Order that was entered on April 24, 2014 in Bureau County, Illinois which provided in part as follows:

   a. The parties are named as joint custodian of the minor child and that joint custody of the minor child of the parties, namely Madeline, is awarded to the parties, Petitioner, Kevin Roy Kramer, and the Respondent, Julia C. Eickmeier. Each parent shall be designated the "Custodial Parent" while the child is in their respective physical possession, and likewise, the other respective parent shall

be designated as the "Non-Custodial Parent" while not having physical possession of the minor child.

b. The minor child shall be in custody of Petitioner, Father, as follows:

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(vii) For such other times as the parties can agree upon. Father agrees to cooperate with Mother in providing daycare or babysitting assistance through his use of custodial time, when practical.

IT IS ORDERED:

That the Petitioner, JULIA EICKMEIER, upon not less than five (5) days personal service, appear before this Court at the LaSalle County Courthouse, 119 W. Madison, Ottawa, Illinois, Courtroom #407 at the hour of 1:30 p.m. on August 28, 2015 and that she then and there show cause, if any, as to why she should not be adjudged guilty of an punished for contempt of this Court for failure to obey said Order.

Entered: July 20, 2015

JUDGE

YOUR FAILURE TO APPEAR AT THIS HEARING MAY RESULT IN THE ISSUANCE OF A WARRANT FOR YOUR ARREST.